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April 3, 2025

VIA ECF

Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

Re: *Baldwin v. TMPL Lexington LLC et al.*, 23-CV-9899 (PAE)

Dear Judge Engelmayer:

I am writing to request a stay of discovery proceedings so that the parties can attempt a resolution of this matter.

On February 13, 2025, Your Honor granted Plaintiff's request for an extension of time to complete discovery by April 21, 2025. Since that time, we have engaged in discovery and have completed one deposition. Four depositions are scheduled for next week and one deposition is scheduled for the week after that.

The Plaintiff and Defendants believe that settlement discussions may be fruitful at this time and would like to move forward with them without having to incur the significant expense of taking additional depositions. We do not believe that we would be able to resolve the matter before the taking of additional depositions or by April 21, 2025, but would like the opportunity to explore settlement.


Therefore, we respectfully request that the Court grant a stay of discovery to permit the parties to explore a settlement of this matter. Our preference is to pursue a private settlement and not seek a referral to Magistrate Judge Ricardo at this time. We are available to discuss this matter further at the Court's convenience.

Respectfully submitted,

/s/ Isabelle A. Kirshner  
Isabelle A. Kirshner, Esq.  
*Counsel for Defendants*

GRANTED. The Court is persuaded that a stay of discovery is merited in order to facilitate settlement. But, in light of this case's long history, the Court will authorize only a brief such stay. Specifically, the Court will stay the fact discovery end date by one month, *i.e.*, until May 21, 2025, for the purpose of facilitating settlement. The parties are to submit forthwith a revised case management plan consistent with a stay of this duration.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge

April 4, 2025  
New York, New York